

21 May 2020

Dame Louise Casey DBE CE
Ministry of Housing, Communities and Local Government
2 Marsham Street
London SW1P 4DF

Dear Dame Louise Casey,

We write as members of the National Domestic Abuse Policy and Practice Group, which includes representation from leading domestic abuse, LGBT, homelessness and housing agencies. The group aims to find consensus, share best practice and influence policy and practice on domestic abuse and housing in England and devolved authorities.

We welcome your leadership of the new government taskforce on rough sleeping and Covid-19, and stand ready to support the work of the taskforce. We ask that you draw on the expertise of the Violence against Women and Girls (VAWG) sector to make sure that women and survivors staying in hotels and other emergency accommodation for people sleeping rough are not forced to return to their abusers or to the streets following the pandemic.

We are encouraged by the robust action that government has taken to ensure that homeless people can move off the streets and out of night shelters into emergency hotels where they can self-isolate. However, we stress that Covid-19 is not the only risk facing homeless women at this time. Government, specialist agencies and the police have recognised the elevated risk of harm from domestic abuse and other forms of VAWG while lockdown measures are in place.

Evidence and experience show that the majority of homeless women are survivors of domestic abuse and other forms of VAWG. A 2018 evidence review by the University of York found that *“experience of domestic violence and abuse is near-universal among women who become homeless”*. In response to ongoing risks to their safety, survivors will often take steps to hide themselves while sleeping rough or rely on unsafe hidden homeless arrangements with family, friends or partners, including perpetrators of abuse.

We strongly welcome recent measures announced by government to tackle domestic abuse, including the commitment to amend the Domestic Abuse Bill to grant automatic priority need to people fleeing domestic abuse. This should provide thousands more survivors of abuse with access to settled and permanent accommodation, if properly funded. We know that survivors facing rough sleeping experience multiple disadvantages alongside domestic abuse and other forms of VAWG, and therefore require a distinct and urgent approach.

We view the government’s action to bring ‘everyone in’ as a unique opportunity to support and safely accommodate this very vulnerable group of survivors who may otherwise be hidden and go unsheltered and unsupported. A targeted approach will also help to define the size and profile of this hidden group, ahead of new duties on local authorities to assess need and provide support to survivors through accommodation-based services following the passage of the Domestic Abuse Bill.

Whilst the government provided clear direction and funding to councils to house those sleeping rough and in night shelters during lockdown, to date there has been no clear strategy or dedicated investment in supporting homeless women. This is essential to deliver the safeguards that women survivors of violence and abuse require – including women-only accommodation, the provision of ongoing specialist support and additional security measures for safety.

Some local areas are now acting independently to make additional accommodation available, but there has been no clear national guidance on doing so. The recent £10 million fund from the Ministry of Housing, Communities and Local Government for refuges and safe accommodation does allow for increasing capacity, as well as maintaining existing provision, but again provides no clarity on *how* additional accommodation for women survivors should be delivered.

We urge that the same issues are not overlooked as we move into the next phase of the Covid-19 response. This requires a tailored approach to women's move-on from the hotels and other emergency accommodation, informed by the expertise of the specialist VAWG sector. A generic approach to move-on will risk placing women and survivors in accommodation without the security and specialist support they need to sustain their recovery from homelessness and abuse, and leave them at risk of returning to the streets or their abusers. Of course, the issue of move-on from refuges also remains a significant challenge, which requires separate consideration to ensure that spaces are made available for the women and children who need them.

Careful consideration will also be needed to ensure that perpetrators of abuse are not placed at risk of homelessness and rough sleeping during the move-on process. A lack of safe, risk-managed accommodation pathways for perpetrators increases the risk of further abuse and exploitation. Perpetrators who are made homeless may return to the survivor's accommodation or target other vulnerable homeless women and survivors.

Much of the work to protect and support homeless women and survivors as they move on from hotels and other emergency accommodation will fall to local authorities, combined authorities, and homelessness charities. However, we urge the taskforce, Ministers and officials to provide strong leadership, guidance and sufficient resources to support the following recommendations:

- Involve the Domestic Abuse Commissioner and specialist VAWG agencies in planning move-on accommodation and support for women and survivors, and issuing specific guidance to local authorities.
- Keep emergency hotels and other accommodation open for as long as it takes to safely house everyone. No survivor should be forced out of emergency accommodation without an offer of suitable alternative housing and appropriate support.
- Provide more accommodation for women facing multiple disadvantage. This will mean urgently increasing funding for specialist refuges that can house survivors with mental health and substance use issues, Housing First for women, floating support and supported housing services. Women-only services and spaces should be available in every local area.
- Fund specialist VAWG agencies to provide community support to help survivors facing multiple disadvantage stay safe, including survivors living with mental health and substance use problems, and those who are street homeless.
- Develop safe accommodation and support options for homeless couples currently isolating together in emergency accommodation, at increased risk from domestic abuse. The taskforce may wish to draw on the recently published [Homeless Couples and Relationships Toolkit](#) published by St Mungo's in March 2020, as well as [ground-breaking research](#) by Homeless Link and Brighton Women's Centre.
- Where survivors in couples choose to leave a relationship, local authorities should work with specialist domestic abuse agencies to accommodate perpetrators as well as survivors, to prevent the perpetrator returning to rough sleeping or to the survivor's accommodation. Funds should be made available to support this.

- Provide sufficient funding and flexibility from central government to ensure that people who are subject to No Recourse to Public Funds (NRPF) conditions - or are otherwise not entitled to welfare benefits and homelessness assistance in the UK - do not return to the streets or to their abusers, to the detriment of the government's commitments to end rough sleeping and tackle violence against women and girls. This should include lifting NRPF funds restrictions for survivors of VAWG for a minimum of 12 months to allow access to safe accommodation and time to receive immigration advice, and work cross-Government to address barriers to survivors with NRPF accessing support from specialist domestic abuse agencies.

We look forward to working with you to ensure that every woman and survivor has access to safe, secure housing with the right support to escape homelessness and abuse for good. To arrange a meeting with members of the National Group, please contact catherine.glew@mungos.org.

Yours sincerely,

The National Domestic Abuse Policy and Practice Group has representatives from the domestic abuse, LGBT+, housing and homelessness sectors. The following members of the group have given their signature to this letter:

Donna Covey CBE, Chief Executive, **AVA (Against Violence and Abuse)**

Jemima Olchawski, Chief Executive, **Agenda**

Jon Sparkes, Chief Executive, **Crisis**

Kelly Henderson, Co-Founder, **Domestic Abuse Housing Alliance (DAHA)**

Kyla Kirkpatrick, Director, **Drive**

Tom Copley, Deputy Mayor for Housing and Residential Development, **Greater London Authority**

Rick Henderson, Chief Executive, **Homeless Link**

Sarita-Marie Rehman-Wall, Chair, **National Federation of ALMOs**

Kate Henderson, Chief Executive, **National Housing Federation**

Natalie Blagrove, Domestic Abuse Community Safety Lead, **Peabody**

Respect

Suzanne Jacob, CEO, **SafeLives**

Howard Sinclair, Chief Executive, **St Mungo's**

Gudrun Burnet, CEO, **Standing Together Against Domestic Violence**

Tina Wathern, Director of Education and Engagement, **Stonewall Housing**

Dr Nicola Sharp-Jeffs, Chief Executive, **Surviving Economic Abuse (SEA)**

Nicki Norman, Acting Chief Executive, **Women's Aid Federation of England**

This letter is also supported by:

Karen Anstiss, Service Manager, **Caritas Westminster**

Des Scott, Interim Chief Executive, **Church Army**

Anna Yassin, Migrant Project Manager, **Glass Door Homeless Charity**

Toni Warner, Deputy Chief Executive, **Single Homeless Project**

Fiona Dwyer, CEO, **Solace Women's Aid**

Nicky Park, Head of Prisons, **St Giles**

Natalie Room, Resident Coach, **Trinity Homeless Projects**

cc. The Rt Hon Robert Jenrick MP, Secretary of State for Housing, Communities and Local Government; Luke Hall MP, Minister for Rough Sleeping and Housing